

Your specific request was that OSHA indicate whether your training program would satisfy HAZWOPER refresher training requirements. As a matter of policy, OSHA does not approve or endorse training programs. The employer, rather than the training provider, is ultimately responsible for ensuring that employees acquire the training and skills needed to perform their duties in a safe and healthful manner. We will, however, attempt to clarify our position on hands-on training and trainer availability for HAZWOPER training in relation to the program you describe.

For HAZWOPER refresher training, OSHA indicated in the 11/22/94 letter to Ward that the employer may determine that hands-on training is unnecessary for a given refresher course. To make this determination, however, we indicated that the employer must assess the employees' skill level and ensure that the employees remain competent in their assigned duties. In general, OSHA encourages the use of hands-on training even in refresher courses because it is an effective means for auditing worker performance of safety-related skills.

Hands-on training typically involves trainees interacting with equipment and tools in the presence of qualified trainers. This situation ensures that workers have an opportunity to learn or refresh their skills by experience and allows the trainer to assess whether workers have mastered the proper techniques.

OSHA has no basis for evaluating your proposed approach to hands-on training, which involves trainees videotaping their demonstration of skills for trainer review. Unfortunately, studies that examine the effectiveness of technology-based training approaches among various worker populations do not seem to keep pace with the use of these approaches. Our impression, however, is that this approach does not support the purpose of hands-on training. We question whether the limited and delayed interaction between the trainer and trainee allows the trainee to learn by experience. In addition, we can foresee limitations in a trainer's ability to evaluate a trainee's skills via videotape unless the video camera(s) can capture the performance from multiple angles and with good clarity.

As a practical matter, this approach sounds as though it could be more time-consuming than traditional hands-on training if the trainee did not perform the skills correctly or if the videotape was not sufficiently clear. Your letter did not address how re-evaluation would be handled.

Finally, with regard to the specific hands-on training topics you list, the choices appear to be limited. Donning and doffing personal protective equipment (PPE) other than a respirator, for example, is an important safety skill that many employers may want their employees to review. As we stated above, however, the employer is ultimately responsible for ensuring that employees acquire the training and skills they need to perform their work safely and would need to evaluate your program with the employees' needs in mind.